

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

---

DIRECT REPORT CORPORATION d/b/a  
SHAREHOLDER.COM,

Plaintiff,

v.

CCBN.COM, INC. , THE THOMSON  
CORPORATION, JOHN DOES 1 through 5,  
and JANE DOES 1 through 5,

Defendants.

Civil Action  
No. 04-10535-PBS

---

**[PROPOSED] ORDER**

The Court ORDERS the Office of the Attorney General for the Commonwealth of Massachusetts to produce to Anthony S. Fiotto of Goodwin Procter LLP, Exchange Place, Boston, MA 02109 and Thane Scott of Palmer & Dodge LLP, 111 Huntington Avenue, Boston, MA 02199 (the “parties’ counsel”) all documents within the scope of the August 20, 2004 subpoena served by Shareholder.com, with the exception of documents containing internal attorney communications or attorney work-product. The documents shall be treated as “Highly Confidential” under the parties’ Stipulated Protective Order for five business days from the date both parties receive the documents. During that five-day period, each party shall have the opportunity to make appropriate confidentiality designations under the Stipulated Protective Order. This Order orders the Attorney General to produce the above-referenced documents only to the parties’ counsel, and neither requires nor authorizes the Attorney General to produce or otherwise

make available such documents to any other person. The parties agree that this Order should issue.

GOODWIN PROCTER LLP	PALMER & DODGE LLP
<p>/s/ <u>Anthony S. Fiotto (MA)</u> Anthony S. Fiotto (BBO #558089) David M. Moss (BBO #649707)  Exchange Place Boston, MA 02109-2881 (617) 570-1000  <i>Counsel for Defendants</i></p>	<p>/s/ <u>John T. Bennett</u> Thane D. Scott (BBO #449340) Ruth T. Dowling (BBO #645568) John T. Bennett (BBO #648464)  111 Huntington Avenue Boston, MA 02199 (617) 239-0100  <i>Counsel for Plaintiff</i></p>

SO ORDERED:

---

Honorable Joyce London Alexander  
United States Magistrate Judge

Dated: \_\_\_\_\_  
Boston, Massachusetts